# **EXHIBIT I**

March 19, 2025

Honorable Michael E. Farbiarz United States District Judge District of New Jersey Martin Luther King Courthouse 50 Walnut Street Newark, NJ 07101

### PURSUANT TO 28 USC 1746, I HEREBY DECLARE THE FOLLOWING:

Dear Judge Farbiarz,

I am writing this letter to you in support of Mahmoud Khalil. My name is am a U.S. citizen and identify as Jewish. I graduated from Columbia University's School of International and Public Affairs (SIPA) in May 2024 and have known Mahmoud Khalil for about two years since he started his studies at SIPA in January 2023.

I consider Mahmoud a colleague, fellow advocate and profound human being. I regard Mahmoud as a thoughtful, committed, highly intelligent, curious and pacifistic person. I developed this understanding of his character through my many interactions with him at Columbia in classrooms, social outings, and advocacy circles. I have had countless discussions with him about international affairs, politics and the Israeli-Palestinian conflict. I can point to several specific examples that highlight Mahmoud commitment to non-violent, respectful language and building an inclusive pro-Palestinian movement on campus.

My first interaction with Mahmoud was in March 2023. Over the prior winter break, I participated in a trip to the Occupied Palestinian Territories organized by PalTrek National. As a follow-up to the trip, a discussion was convened with participants of the trip to highlight our experience. I offered to speak about my experience as a Jewish person who has traveled to Israel on multiple occasions before this trip. I was honest about my participation in Birthright International, a fully-funded trip for American Jewish youth to experience Israel. Birthright has received criticism from anti-Israel groups for its support of resettling American Jews to Israel, often at the expense of Palestinian families. While some students at SIPA expressed valid concerns about including my experience over others from the trip, Mahmoud personally welcomed my inclusion in the panel. Mahmoud saw the importance of including my voice in this discussion and highlighting the complicated pressures on American Jews. Mahmoud, starting at SIPA in January, did not participate in the trip and did not know me beyond my identity as

Jewish and previous participant in Birthright. Instead of leaning into stereotypes or succumbing to the pressures of others, Mahmoud saw me as a human being with a long and complicated relationship to my religious identity and its connection to the state of Israel.

The next incident I'd like to highlight occurred in October 2023. Following the Hamas-led terrorist attacks on October 7th and subsequent military response by Israel, the Dean of SIPA, Keren Yarhi-Milo, asked to meet with some SIPA students to understand the impact of the war on Palestinian students. Mahmoud was in attendance. Mahmoud began the meeting by asking Dean Yarhi-Milo, an Israeli citizen, how she, her family and community were doing in light of the terrorist attack. In asking the question, Mahmoud condemned the violent, hateful act by Hamas terrorists and expressed grief for the immediate loss of life and continued impact on the communities. Even Dean Yarhi-Milo appeared touched by the question and expressed gratitude for his consideration of her experience of this violence as an Israeli woman.

From October 2023, tensions on campus elevated. I've watched Mahmoud on several occasions de-escalate tense situations on campus, leading with peace to usher a constructive dialogue rather than inciting aggression that leads to hate speech. I saw Mahmoud, as well as other Arab classmates, confronted and, at times, harassed by other students, asking him if he supported Hamas. Mahmoud would not raise his voice or respond with aggression, but instead simply answer the question by condemning Hamas and all forms of violent extremism. Mahmoud recognized this was a tactic to coerce him to promote hateful or extremist language, but he never wavered in his denouncement of all forms of violent extremism, including the actions of Hamas on October 7th.

On October 25th 2023, over 20 students, including myself, were targeted in a doxing campaign by the right-wing media organization, Accuracy in Media. The organization launched an online petition, personal website for each student, and paraded a billboard truck around campus displaying my name and photo under the banner, "Columbia's Leading Antisemite." The false statement was attributed to my position as the President of SIPA's Human Rights Working Group. Mahmoud, not targeted at that time by this doxing campaign, reached out to me personally to check in on my well-being. He recognized that my identity and work experience with Jewish organizations contradicted the claim of antisemitism, and offered his support. He expressed his support not in justification of antisemitism, but as defamatory action to distract from legitimate antisemitism happening on campus, saying to me, "by targeting the Jewish student and ignoring the very real antisemitism happening on campus, [Accuracy in Media] has made it clear their motives are not to protect Jewish people."

I can point to additional incidents that occurred in April 2024 during the Solidarity Encampment at Columbia University. During the Encampment, Mahmoud led community-wide discussions on how to ensure the space was free from hate and discrimination. Through this, he helped develop

community guidelines for the encampment that indicated any expression of hate speech will not be tolerated. On one occasion, some individuals made remarks that I personally found offensive as a Jewish person. I saw Mahmoud visibly uncomfortable, and instead of berating or verbally attacking the individuals, he approached them calmly to deescalate the situation by saying, "that's not a productive approach. We need to focus on law, not emotion." His priority has always been advocacy through nonviolent means, centering facts, legal arguments, and mutual respect.

ICE may attempt to use his participation in the Encampment protest against him, but that would be a complete distortion of reality. Mahmoud has actively included Jewish voices in conversations about Israel-Palestine. In fact, during the first day of Jewish Holy Days of Passover, I asked Mahmoud for his help in hosting a Passover Seder at the Encampment specifically for a non-Jewish audience. Mahmoud was very helpful in connecting me with the leadership of the Encampment and ensuring I had a large, safe space to host the Seder. Not only did he attend the Seder, Mahmoud invited his non-Jewish friends, understanding the importance of including non-Jews in the celebration of this Holy Day. Following the Seder, he commented to me directly, "thank you for hosting and inviting me to this Seder. It was my first time being invited to a Passover Seder and I am very thankful to have learned more about Judaism." His gratitude and support of this initiative further highlights his understanding of the value of including Jewish voices in typically non-Jewish spaces. In that moment, Mahmoud saw me, not just as a Jew but as a fellow human being equally committed to his message of nonviolence and peace.

Additionally, ICE and Federal officials may penalize Mahmoud for his visibility during Columbia's protests because he was selected as a press representative from the student negotiating team. Only specific students were selected for these roles to ensure the peaceful purpose of the protests were expressed calmly and without hatred. I watched him on several occasions be tested by the press with leading questions that sought to charge the conversation with antisemitic or extremist messaging, and Mahmoud maintained his calmness, commitment to promoting peace on campus and sensitivity to hateful or extremist rhetoric. His role as a student negotiator underscores his commitment to finding a peaceful end to the Encampment through dialogue with Columbia's administration.

I trust these examples provide insight into Mahmoud's character and context to his participation in nonviolent protests that may be weaponized against him. His commitment to peaceful dialogue, particularly the creation of interfaith spaces, exemplifies what I have personally witnessed: Mahmoud has never engaged in or expressed support for antisemitic nor extremist ideology. He is an incredible advocate, good-faith member of the Columbia Alumni community, and a kind human being. I urge you to support his immediate release.

I DECLARE UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

**EXECUTED ON 3/19/2025** 

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Phone number:	
Mailing Address:	

Thank you for your time and consideration. I sincerely appreciate the Court's attention to this matter. If the Court requires any further information, I can be reached at the contact information above.

Honorable Jesse M. Furman, United States District Judge, Southern District of New York, Thurgood Marshall Courthouse, 40 Centre Street, New York, NY

18 March 2025

#### Statement in support of Mahmoud Khalil

Dear Judge Furman,	
My name is, I am a fr express my support for him, and to vouch for	iend and former colleague of Mahmoud Khalil. I write to his conduct and character.
I know Mahmoud in both a professional and working for the same team in the worked for the joined	d personal capacity. Professionally, we spent two years . Mahmoud

At work, Mahmoud was thoughtful and hard-working, consistently receiving the highest grade in his yearly appraisal. It is notable that Mahmoud was security cleared to work at the British Embassy in Beirut, one of the most politically sensitive posts in the diplomatic network. He was a trusted member of the team, showing discretion and personal integrity in all that he did. This is abundantly clear when examining the nature of Mahmoud's day-to-day work. Mahmoud was responsible for overseeing the Chevening Scholarship fund that brings some of the brightest students from Syria to study at British universities. In this role, he was privy to the sensitive personal information of hundreds of young Syrians who had grown up in Bashar al-Assad's brutal dictatorship - information which he handled with total discretion.

After I left the , I moved to Beirut to study Arabic and start a new career in journalism. It is at this time that I really became friends with Mahmoud. Outside of work he is tremendously fun to be with, especially when there is music involved. He is a loyal friend and is always generous with his time. He has spent hours answering my questions about the vagaries of regional politics, and would always insist on giving me a lift home across town after a disappointing evening of watching England play football (soccer).

President Trump's characterization of Mahmoud could not be further from the truth. His activism is a reflection of the very best of his character, not some radical impulse or subversive agenda. Mahmoud is motivated by the desire to see justice for Palestinians, but one does not need to agree with his politics to admire his courage in pursuing that aim. As an immigrant of Palestinian-Syrian heritage, Mahmoud has been dealt one of the weakest geo-political hands imaginable, and yet he stood up to one of the most powerful educational institutions in the world, despite the personal risk that this involved. His integrity and moral conviction is an example to all of us.

I hope you will take this testimony into consideration, and I would be happy to provide any further information that might help with your judgement.

Yours sincerely,	
Contact:	

Honorable Jesse M. Furman United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Centre Street, New York, NY

#### Dear Judge Furman,

I am writing in support of my friend and neighbor Mahmoud Khalil. My name is and I am an Associate Professor at Columbia University. Over the past year, I have joined with a diverse group of other Jewish colleagues to speak out in defense of our students' right to protest the ongoing violence in Gaza. Through this advocacy, I have had the good fortune to get to know Mahmoud well. He is an upstanding, principled, and well-respected member of our community.

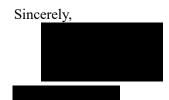
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I wish to convey to you in the strongest possible terms that the slander, insinuations, and guilt-byassociation leveled against Mahmoud by everyone from anonymous trolls on social media to the White House could not be further from the truth known by those of us who know Mahmoud firsthand. I first got to know Mahmoud when he invited me to a film screening and panel discussion organized by himself and other Palestinian students in an interest of dialogue and understanding about the roots of disagreement on our campus. After the Gaza Solidarity Encampment arose on our campus and he stepped in as a mediator and spokesman, I only grew more impressed by his character, his kindness, and his commitment to a vision of liberation and justice both here and in Israel-Palestine that includes everyone, of all creeds and backgrounds.

Mahmoud's commitments to peace and collective liberation are a matter of public record. I myself have heard him openly express his opposition to antisemitism and all other forms of prejudice. I have given him my personal phone number and we have spoken often, whether just to catch up or whenever either one of us had a concern or question about something happening on campus. I have given him my trust on sensitive subjects and he has extended his in return. I have heard personally from Jewish students and others about how welcome and safe they feel around Mahmoud. I have heard firsthand how he has rebuked people who have said hurtful or prejudicial things in the context of the protest movement. I have stood beside him on live television to defend our students' right to protest and I would not have done this if I believed any of the things being said about him by the government or by his doxers and harassers on social media were true.

My understanding is that even unkind people have rights. However, since Mahmoud's character and beliefs are, I understand, at issue in this case, let it be said Mahmoud is among the kindest, gentlest, and most principled people I have had the chance to meet over the last year and a half of turmoil on our campus. There are not many people whose phone calls I will take at any hour without hesitation. Mahmoud has always listened to my concerns in private and always spoken for inclusive visions of peace and collective liberation in public. His role in the campus protests has always been that of mediator, spokesman, of peacemaker, as one who seeks resolution, not inflammation, to conflict. He represents the best of what this student body has to offer.

I am happy to provide more information if it can be helpful to the court. I can be reached by phone at or by mail at Thank you for your consideration of my experience and perspective.



Honorable Jesse M. Furman United States District Judge District of New Jersey 50 Walnut St., #4015 Newark, New Jersey 07102

Dear Judge Farbiarz,

I am writing this letter in support of Mahmoud Khalil.

I met Mahmoud almost 12 years ago, when I spent a summer in Beirut reporting on the Syrian refugee crisis. Mahmoud was 18 and had just recently fled Syria by himself. He was painstakingly teaching himself English and volunteering his time to help fellow Syrians build new lives from the rubble of a brutal dictatorship and civil war. He often referred to himself as a "double refugee"—a Palestinian in Syria, who grew up in a refugee camp in Damascus, and a Syrian refugee in Lebanon. He was one of the most courageous, gentle, and kind souls I ever met. And he remains one of the most courageous, gentle, and kind humans I know. Mahmoud shouldn't have to be extraordinary to deserve our empathy—or to ignite our rage over the injustice of it all. But he is.

When we crossed paths in Istanbul a few years ago during Ramadan, we celebrated over a huge iftar—the breaking of the fast. Mahmoud was admitted to Columbia SIPA as a graduate student. He was deeply humbled and full of hope. Against all odds, he not only built a new life for himself, but was now going to further his development studies so to better serve marginalized communities around this world. "This will help me serve all the others—so many others—who didn't and won't get a chance," he told me. That's the thing about Mahmoud: his north star is creating opportunities for others, even when he barely had any himself as an 18-year-old refugee fleeing Bashar Al-Assad's murderous dictatorship.

Columbia should be honored to call Mahmoud, a humanitarian in the truest sense of the word, an alumnus.

Mahmoud has dedicated his life to protecting the dignity of others. And we now must protect his.

You can reach me at and

Thank you,

March 20, 2025

## COLUMBIA UNIVERSITY

IN THE CITY OF NEW YORK

DEPARTMENT OF HISTORY

March 19, 2025

Honorable Michael E. Farbiarz United States District Judge District of New Jersey Martin Luther King Courthouse 50 Walnut Street Newark, NJ 07101

Dear Judge Farbiarz,

I am writing this letter in support of Mr. Mahmoud Khalil, whom I have known since he took the graduate section of my course, "History of the Modern Middle East," HIST 6998, in the fall semester of 2023.

I am the in the Department of History at Columbia University, where I taught for a total of 23 years until my retirement in July 2024. Before that I taught for sixteen years in the Department of History at the University of Chicago. I have also taught at Georgetown University, the American University of Beirut, and the Lebanese University. I have served as the President of the Middle East Studies Association, and as an adviser to the Palestinian delegation during the 1991-1993 Madrid-Washington Palestinian-Israel peace negotiations. I am the author of eight books on Middle Eastern history that have been translated into dozens of languages, and the co-editor of three others.

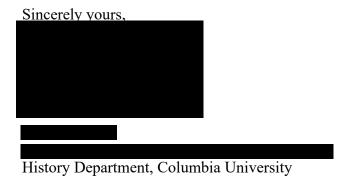
Mr. Khalil was an outstanding student in my course, taking an active part in the discussion sessions and in class, producing excellent take-home essays in the midterm and final exams, and obtaining the grade of A. Although he had far broader experience than they did of the history and politics of the Middle East, having grown up there and having worked for the British Embassy in Beirut, he was always respectful of other less knowledgeable students, and never dominated the discussions. His contributions were thoughtful and always to the point.

I got to know Mr. Khalil further during the subsequent months, when he became a negotiator for the students protesting Israel's war on Gaza with the Columbia administration, trying to bring the protests to a peaceful, mutually satisfactory end. This was a difficult task, as the administration was under intense external pressure. As far as I could tell, he performed this task in good faith, although his efforts, and those of faculty colleagues of mine to achieve the same end, were ultimately unsuccessful.

I also got to know Mahmoud through my wife, a former at the School of International and Public Affairs (SIPA), where he was a student, as he and other SIPA students often consulted her for career advice and sometimes personal advice. We got to know him and his wife Noor socially, and I found him to be a dedicated family man, caring of her, and deeply considerate. He was also a source of solace and support for younger Palestinian students who had been doxed, harassed and callously treated by the University, which provided them with little or no support.

Mr. Khalil is a straight-forward, honest and soft-spoken individual, whom I have always found to be clear headed and mature beyond his years. In stark contrast with the entirely false picture of him portrayed by some, he is neither an extremist nor a hot-head, but rather someone deeply concerned about the fate of his people, the Palestinians. This is perfectly understandable, coming from someone whose family were forced to take refuge in Syria in 1948 after being driven from their homeland, and then had to leave Damascus due to the civil war there of the past fourteen years, which destroyed their home, and made them refugees once again.

I hope this background on Mr. Khalil is helpful to you in deciding on his case.



Honorable Jesse M. Furman United States District Judge Southern District of New York **Thurgood Marshall Courthouse** 40 Centre Street, New York, NY

RE: Letter in Support of Mahmoud Khalil's Bail Hearing

Dear Judge Furman,

I am writing this letter in support of my dear friend Mahmoud Khalil. My name is and I am a recent graduate of Columbia University, Mailman School of Public Health, Class of 2024. As a proud U.S. citizen, I deeply value free speech and am committed to protecting our First Amendment and constitutional rights. What has happened to Mahmoud Khalil greatly troubles me and raises serious concerns about the future of our country.

Mahmoud is more than just a friend; he is a dear brother whom I was fortunate to meet during my time at Columbia and in New York. The first time I met Mahmoud was at a refugee advocacy and human rights event organized by SIPA. I was sitting in the front row, listening to a top diplomat's testimony when Mahmoud raised his hand and shared his personal refugee story, leaving us all in awe. Mahmoud's journey of displacement and resilience should be taught in every classroom across the world. I have yet to meet anyone who humanizes people, situations, and stories like Mahmoud does. It didn't take long for me to understand the essence of who Mahmoud is. He is affable, generous, intelligent, articulate, funny, caring, and humble. After the event, I approached him, we chatted, walked across campus together, and, as expected, he invited me over for tea. He convinced me to drink it by promising to make the best mujaddara (lentil rice dish from the Levant)—and he delivered; it was delicious. Beyond his culinary talents, Mahmoud's taste in music is worldly. His playlists reflect every experience and place he's visited, and, of course, every song has a story behind it—spanning from his time in Syria to the vibrant nights in Beirut.

On a professional level, I had the privilege of working with Mahmoud during our internships at the United Nations while pursuing our graduate studies. I witnessed firsthand Mahmoud's dedication to social justice, global issues, and his political acumen. Mahmoud is pragmatic, diplomatic, and sensible—traits that are evident in his successful relationships with colleagues, classmates, and professors.

Mahmoud has a unique ability to make people feel seen and heard. Above all, he is a loving husband, married to a kind-hearted woman, and I have no doubt that he will be an amazing father. His wife deserves to have him by her side during the birth of their first child, and we owe it to their child to be born in a country that values free speech and upholds the fundamental freedoms of its residents.

The absence of Mahmoud is profoundly felt by his loved ones, as well as by the broader academic and professional circles he is part of. His influence on both our intellectual and social spheres is immeasurable, and his detention marks a significant loss for all who know him.

Therefore, I respectfully urge the court to release Mahmoud from his unjust detention and bring him back home to his wife. I ask the court not to rob Mahmoud of one of the most significant moments of his life as he prepares to welcome his firstborn.

Sincerely,

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

**EXECUTED ON MARCH 19, 2025** 



Thank you for your time and consideration. I sincerely appreciate the Court's attention to this matter. If the Court requires any further information, I can be reached at the contact information above.

Honorable Michael E. Farbiarz United States District Judge District of New Jersey Martin Luther King Courthouse 50 Walnut Street Newark, NJ 07101

March 19th, 2025

Dear Judge Farbiarz,

I am writing this letter in full support of Mahmoud Khalil. I am a Lecturer at Columbia University's School of International and Public Affairs (SIPA), where I have been teaching courses in quantitative methods and data analysis for ten years. Mahmoud was not a student of mine; rather, I had the pleasure of meeting him through his advocacy on campus to raise awareness of the humanitarian crisis in Gaza and help support affected students.

I understand that Mahmoud has been an invaluable contributor to the Development Practice program at SIPA, organizing events and programming in his role as Program Assistant. He also served as the Teaching Assistant for a core Development Practice Lab course. He did all of this as a full-time student, while advocating for an end to the war and human suffering in Gaza, and supporting affecting students. On top of this, I know Mahmoud to be a kind and devoted husband and friend to so many at SIPA.

I remember chatting with Mahmoud at several events he participated in. One was a panel that included Palestinian SIPA students who shared their stories of trying to exist as students while their family and friends were under constant bombardment in Gaza. Another event was a discussion with two Columbia faculty members about the charged geopolitical situation in the Middle East. Mahmoud's participation in these events offer just two examples of Mahmoud working to bring people together to foster dialogue and a greater understanding of unfolding events and their impact on the SIPA community. I also remember talking to Mahmoud in my office about designing a survey to gauge the views of students about the school's handling of the situation and allocation of resources. He wanted the school and university leadership to understand the views of their students. The Mahmoud I came to know worked tirelessly to foster understanding, raise awareness, and bring people together.

Mahmoud is interested in building bridges. I know him to be a warm and kind advocate for those whose voices are marginalized, here at SIPA and the world beyond. He came to SIPA to pursue a career in public service, and is deeply committed to fighting oppression through advocacy, public policy, and diplomacy. I understand that his professional goals are to work with

international organizations to influence United Nations member states to uphold international humanitarian law and protect human rights.

Personally, I have had a hard time knowing that there are those at Columbia who are not interested in understanding the different ways that many people in the community are suffering. It gives me hope that there are people like Mahmoud who are deeply committed to fostering mutual understanding. In Mahmoud I found community. I am so incredibly grateful for all that he has done to raise awareness and bring people together. Without him here on campus, I believe that the path forward to a safe and inclusive Columbia is a little less hopeful.

Should you have any additione by phone	onal questions about Mahmoud, pl or email	lease do not hesitate to reach out to
Sincerely,		
Columbia University   SIPA		

Honorable Jesse M. Furman United States District Judge Southern District of New York **Thurgood Marshall Courthouse** 40 Centre Street, New York, NY

Dear Judge Furman,

I am writing this letter in support of Mahmoud Khalil. My name is and I am a second-year Ph.D. student at Columbia University. Prior to this, I was a Fellow at Harvard Divinity School. As an older student with significant experience in both governmental and non-governmental sectors, I have encountered a wide range of people and personalities. Today, however, I write to you not only as a friend, colleague, and sister like the figure of Mahmoud's, I write to you in my capacity as a mother.

In Fall of 2023, when I moved to New York last year to pursue my passion and obtain a Ph.D., I found myself navigating this vast city alone with two young children. My days were filled with the challenges of juggling motherhood and attending classes, while my nights were long, spent reading and writing to my carpal tunnel's delight. During these challenging times, I came to realize how crucial community really is. Mahmoud, seeing the struggles I faced, stepped in without hesitation. He took on the role of an older brother, inviting us over for dinners and engaging my children in games. Soon enough, my 4-year-old son began asking, "Are we going to see your funny friends?" whenever he wanted to see Mahmoud.

Never hesitating to help, Mahmoud has a natural and effortless way of stepping in and making everyone feel at ease. I remember, one day last Summer, while attending a street festival, my son had stopped in the middle of the bustling sidewalk to protest what he deemed to be an unfair allocation of ice cream between him and his older sister. Desperate to avoid being swept by the crowd, I pleaded for him to keep walking. Defiant, he swung his arms around his little body, picked up his foot and kicked the ground not knowing my toes had shuffled into that very same spot. In the midst of my silent discomfort, Mahmoud stepped in, offering a water bottle and giving my son a ride on his shoulders. While I recovered from the pain and muttered under my breath, Mahmoud had successfully and effortlessly fended off one of many future encounters I hope he has with his son.

That's who Mahmoud is: a caretaker. He empathizes with everyone, quickly identifies what's needed, and fills the gap without hesitation. He's never flustered, always calm, and a steady presence in times of stress. Mahmoud is grounded in logic, adept at resolving conflict, and always ready to serve as a mediator. In fact, he was the father figure the university neglected to be.

Mahmoud cares about injustice in any form, whether it's watching a mom get her toe stepped on by a screaming toddler or watching the children of Gaza be torn to shreds. Therefore, although

Mahmoud is a friend, and a big brother, I write to you as a mother: Mahmoud deserves to be a father. It is who he is and all he has ever been.

Kind Regards,

